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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

10 ANGELA EVANS, an individual,

11 Plaintiff,

12 vs.

13 VALLEY ELECTRIC ASSOCIATION, INC.;
14 DOES I through X; and ROE Corporations XI
15 through XX, inclusive,

Defendants.

16 ANGELA EVANS,

17 Plaintiff,

18 vs.

19 NYE COUNTY SHERIFF'S OFFICE, a political
20 subdivision of the State of Nevada; DAVID
BORUCHOWITZ, individually,

Defendants.

Case No. 2:20-cv-00986-RFB-VCF

Case No. 2:20-cv-01919-RFB-VCF

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE
REBUTTAL EXPERT DEADLINE
(First Request)**

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23 ANGELA EVANS ("Evans"), VALLEY ELECTRIC ASSOCIATION, INC. ("Valley
24 Electric"); NYE COUNTY SHERIFF'S OFFICE ("NCSO"), and DAVID BORUCHOWITZ
25 (collectively, the "Parties," and each a "Party"), by and through their respective counsel, stipulate
26 as follows:

27 WHEREAS, the deadline to disclose rebuttal experts is currently set for June 11, 2021
28 [ECF No. 49];

1 WHEREAS, Plaintiff has represented that her damages expert is not available for
 2 deposition until after the rebuttal expert deadline has passed, which impacts Defendants' ability to
 3 timely complete their rebuttal expert report;

4 WHEREAS, Defendant Valley Electric Association, Inc. issued a subpoena and deposition
 5 notice scheduling the deposition of Plaintiff's Human Resources expert, Ms. Coneisha Sherrod, for
 6 June 8, 2021;

7 WHEREAS, the Sherrod deposition did not go forward as previously scheduled, which
 8 impacts Valley Electric Association, Inc.'s ability to timely complete its rebuttal expert report;

9 NOW THEREFORE, in light of the foregoing, all parties stipulate and agree that the
 10 deadline for disclosing rebuttal experts, currently set for June 11, 2021, is continued by thirty-one
 11 (31) days to **July 12, 2021** (the thirtieth day, July 11, 2021, being a Sunday). Any depositions of
 12 rebuttal experts (or other witnesses that a party intends to offer to rebut the rebuttal expert) may
 13 occur within thirty (30) days after July 12, 2021.

14 Pursuant to LR IA 6-1, the parties state that while the rebuttal deadline has necessarily been
 15 extended as a result of two (2) prior requests to extend the discovery cut-off, this is the first request
 16 directed at continuing only the rebuttal expert disclosure. Good cause exists for this extension, as
 17 one of Plaintiff's experts has been unavailable for deposition, and the other did not appear for her
 18 deposition as noticed. Pursuant to LR 26-3, the parties note that at least five (5) additional
 19 depositions are already noticed and/or will otherwise move forward in this matter. The parties
 20 submit this stipulation not for purposes of delay, but because Defendants have not yet been able to
 21 depose individuals that Plaintiff has identified as experts.

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1 The parties seek only to continue the rebuttal expert deadline. No other deadlines are
2 affected, and no trial date has been set.

3 **IT IS SO STIPULATED.**

4 Dated this 8th day of June, 2021.

5 MARQUIS AURBACH COFFING

6

7 By: /s/ James A. Beckstrom
8 Craig R. Anderson, Esq.
9 Nevada Bar No. 6882
10 James A. Beckstrom, Esq.
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13 Las Vegas, Nevada 89145
14 *Attorneys for Defendants Nye County*
15 *Sheriff's Office & David Boruchowitz*

16 Dated this 8th day of June, 2021.

17 LAGOMARSINO LAW

18

19 By: /s/ Andre M. Lagomarsino
20 Andre M. Lagomarsino, Esq.
21 Nevada Bar No. 6711
22 Cory M. Ford, Esq.
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26 *Attorneys for Plaintiff*

27 Dated this 8th day of June, 2021.

28 GABROY LAW OFFICES

13 Dated this 8th day of June, 2021.

14 FENNEMORE CRAIG, P.C.

15

16 By: /s/ Christian Gabroy
17 Christian Gabroy, Esq.
18 Nevada Bar No. 8805
19 Kaine Messer, Esq.
20 Nevada Bar No. 14240
21 The District at Green Valley Ranch
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23 Henderson, NV 89012
24 *Attorneys for Plaintiff*

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22 Reno, NV 89511
23 *Attorneys for Valley Electric*
24 *Association, Inc.*

25 THE SANFORD FIRM

26 IT IS SO ORDERED.



27 Cam Ferenbach
28 United States Magistrate Judge

6-9-2021

Dated: _____